

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

**HANNAH SABATA, et al.,**

**Plaintiffs,**

**v.**

**NEBRASKA DEPARTMENT OF  
CORRECTIONAL SERVICES,  
et al.,**

**Defendants.**

**Case No. 4:17-CV-3107**

**DEFENDANTS' MOTION FOR  
PERMISSION TO RESTRICT**

COME NOW Defendants, Nebraska Department of Correctional Services, Scott R. Frakes (in his official capacity as Director of the Nebraska Department of Correctional Services), Harbans Deol (in his official capacity as Director of Health Services of the Nebraska Department of Correctional Services), Nebraska Board of Parole, and Julie Micek (in her official capacity as the Board of Parole Acting Administrator), and moves this Court to restrict Defendants' Brief in Support of Partial Motion for Summary Judgment, Index in Support of Partial Motion for Summary Judgment containing Exhibits 2 through 19, 21 through 42, and 45 through 88 because they contain the Plaintiffs' protected health information that should not be public. The sheer volume of records identified makes redaction impractical.

Submitted this July 27, 2018.

**NEBRASKA DEPARTMENT OF  
CORRECTIONAL SERVICES,  
SCOTT FRAKES, HARBANS DEOL,  
NEBRASKA BOARD OF PAROLE, and  
JULIE MICEK,  
Defendants.**

By: **DOUGLAS J. PETERSON**  
Attorney General of Nebraska

*s/ Danielle L. Jones*  
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Attorneys for Defendants.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 27, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court for the District of Nebraska, causing notice of such filing to be served upon all parties registered on the CM/ECF system.

By: *s/ Danielle L. Jones*